

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
Center City Healthcare, LLC d/b/a Hahnemann	:	
University Hospital, <i>et al.</i> ,	:	Case No. 19-11466 (MFW)
	:	
Debtors.	:	Jointly Administered
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Center City Healthcare, LLC d/b/a Hahnemann	:	
University Hospital, Philadelphia Academic Health	:	
System, LLC, St. Christopher's Healthcare, LLC,	:	
Philadelphia Academic Medical Associates, LLC,	:	
HPS of PA, L.L.C., SCHC Pediatric Associates,	:	
L.L.C., St. Christopher's Pediatric Urgent Care	:	
Center, L.L.C., SCHC Pediatric Anesthesia	:	
Associates, L.L.C., StChris Care at Northeast	:	
Pediatrics, L.L.C., TPS of PA, L.L.C., TPS II of PA,	:	
L.L.C., TPS III of PA, L.L.C., TPS IV of PA, L.L.C.	:	
and TPS V of PA, L.L.C.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Pro. No. 21-50912 (MFW)
	:	
HRE Capital, LLC f/k/a Healthcare Real Estate	:	
Capital, LLC,	:	
	:	
Defendant.	:	<b>Re: Docket No. 24</b>
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**AMENDED AGREED PRE-TRIAL SCHEDULING ORDER**

The above-captioned plaintiffs in this adversary proceeding (the “**Plaintiffs**”) and HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC (“**HRE Capital**” and together with Plaintiffs, collectively, the “**Parties**”), have agreed to the following dates and deadlines for this adversary proceeding:

1. The parties shall confer with respect to the selection and appointment of a mediator for this adversary proceeding. If the parties have not filed a notice of selection of a mediator by June 25, 2022, the Court shall select and appoint a mediator from the Register of Mediators. On

or before August 25, 2022 the appointed mediator shall file a notice of completion of the mediation or a status report with respect to the mediation. The mediation shall be conducted in accordance with Local Rule 9019-5 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware.

2. All fact discovery shall be initiated consistent with applicable rules of procedure so that fact discovery including depositions of fact witnesses are completed by October 31, 2022.

3. The parties shall provide expert reports for any issue on which they bear the burden of proof by November 30, 2022. Any expert report by any of the Parties intended to rebut any other expert report shall be provided by December 31, 2022. All reports shall provide the information required by Fed.R.Civ.P. 26(a)(2)(B).

4. All expert discovery shall be completed by, and discovery shall close on, January 31, 2023.

5. All dispositive motions shall be filed and served by February 28, 2023 and shall be subject to Rule 7.1.2 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware.

6. Following submission of dispositive motions, or the lapse of the deadline set forth in Paragraph 5 above with no dispositive motions having been filed, the Parties may contact the Court to schedule a status conference to discuss, among other things, the scheduling of a pre-trial conference and trial.

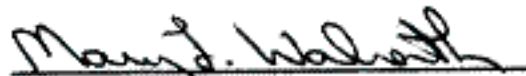
7. The Parties may modify the deadlines set forth herein by (i) mutual agreement (other than with respect to hearing dates, which shall be subject to the Court's availability) or (ii) upon request and further order from the Court, which request may be granted for good cause. The Parties agree to act in good faith in discussing any extension to any deadline.

8. The Parties agree that service by e-mail on all other Parties of discovery requests and written responses is sufficient.

9. This terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

10. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

~~Dated June 16th, 2022~~  
Dated June 16th, 2022  
Wilmington, Delaware



MARY F. WALRATH

3 UNITED STATES BANKRUPTCY JUDGE